

HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

***IN RE SUBPOENA TO JIMMY NGUYEN***

IRA KLEIMAN, as the personal  
representative of the Estate of David  
Kleiman; and W&K Info Defense  
Research, LLC,

Plaintiffs,

v.

CRAIG WRIGHT,

Defendant.

CASE NO. 20-mc-00026-RSL

**DECLARATION OF JIMMY  
NGUYEN**

Noting Date: April 24, 2020

**WITHOUT ORAL ARGUMENT**

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1           6.       On March 6, 2020, the IT support manager for nChain informed me  
2 about an unauthorized attempt to access my nChain.com email account. Because I was  
3 no longer using my nChain.com email, plans were developed to permanently deactivate  
4 my nChain account and avoid any further attempted breaches.

5           7.       My nChain email account was scheduled to be deactivated on March 13,  
6 2020, the day after my formal resignation from the nChain Strategic Advisory Board. I  
7 believe IT support ultimately deactivated my nChain email account on March 19.

8           8.       Since 2017, my roles for both nChain and the Bitcoin Association have  
9 required frequent and extensive international travel as a global advocate for Bitcoin. It  
10 is common for me to be on the road and away from my residence for 1-2 full months,  
11 and sometimes up to 3 full months. My position as Bitcoin Association President  
12 requires such extensive international travel because I am one of the most visible public  
13 advocates on behalf of Bitcoin SV. I frequently attend, host, and speak at a wide  
14 variety of digital currency conferences, many of which the Bitcoin Association hosts  
15 entirely by itself or sponsors with industry third-parties.

16           9.       As a global industry leader for Bitcoin business, the Bitcoin Association  
17 actively promotes and advertises my speaking events through its website (including on  
18 the Events page at <https://bitcoinassociation.net/events/>) and social media accounts.  
19 CoinGeek.com is considered the leading media outlet focused on Bitcoin SV news and  
20 events, regularly advertising these industry conferences—and my speaking  
21 appearances—through its website and social media accounts.

22           10.      I was a speaker at the T-Edge Conference in Beijing, China, which took  
23 place December 6-8, 2019. This event, with my speaking appearance, was publicly  
24 promoted through the Bitcoin Association website, the Bitcoin Association social  
25 media accounts, and the T-Edge Conference website.

1           11.     On December 7, 2019, I presented at the BSV China Conference in  
2     Beijing, China, which was hosted by the Bitcoin Association. This event, with my  
3     speaking appearance, was publicly promoted through the Bitcoin Association website,  
4     the Bitcoin Association social media accounts, and other media platforms.

5           12.     On February 1, 2020, I flew to London, UK to begin a series of  
6     consecutive business trips and conference events that were planned to last  
7     approximately 2 months.

8           13.     On February 8, 2020, I traveled from London to Moscow, Russia to  
9     participate in business meetings and speak at the Future of Sports & Blockchain  
10    Conference on February 14, 2020. This event, with my speaking appearance, was  
11    publicly promoted through the Bitcoin Association website, the Bitcoin Association  
12    social media accounts, and other media platforms. I was in Moscow from February 8  
13    to February 16.

14          14.     On February 16, I returned to London to prepare for and participate in  
15    the CoinGeek London 2020 Conference. That conference took place between February  
16    20 and February 21, 2020. I also participated in many business meetings and related  
17    events in the days before and after the CoinGeek London 2020 Conference. I was  
18    ultimately in London between February 16 and February 28, 2020.

19          15.     CoinGeek is a critical supporter of Bitcoin SV, and its global  
20    conferences are the most recognized and heavily promoted blockchain events for the  
21    entire Bitcoin SV ecosystem. At all CoinGeek conferences to date, including the  
22    CoinGeek London 2020 event, I served as the conference host, program emcee, and  
23    moderator for multiple sessions.<sup>1</sup> These obligations required my physical presence at  
24    the conference venue throughout the entire day and in highly visible settings, both on-  
25    stage and off-stage. The CoinGeek London 2020 Conference was the largest CoinGeek

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<sup>1</sup> In the digital currency industry and media, Bitcoin SV is widely associated with Dr. Craig S. Wright. Therefore, Dr. Wright is also a headline speaker at every CoinGeek Conference.

1 conference to date, and together with my speaking appearance, was publicly promoted  
2 through the Bitcoin Association website, the Bitcoin Association social media accounts,  
3 other media platforms (such as CoinGeek), and press releases to third-party media  
4 outlets. The CoinGeek London 2020 conference (as several past CoinGeek  
5 conferences) was also live-streamed on YouTube. Thus, my appearance at the  
6 CoinGeek London 2020 Conference in February 2020 was widely known.

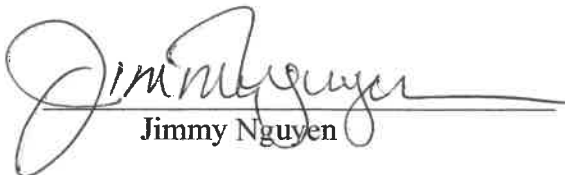
7 16. On February 28, I flew directly from London to Ljubljana, Slovenia to  
8 participate in a March 3 invitation-only Bitcoin SV conference. This event was hosted  
9 by a Slovenian development CREA, along with nChain and the Bitcoin Association. I  
10 also attended business meetings that same week. After Ljubljana, I returned to London,  
11 before traveling to Antigua.

12 17. During the week of March 9-13, 2020, I attended meetings in Antigua  
13 with numerous industry leaders and representatives for companies in the Bitcoin SV  
14 ecosystem. After Antigua, I was originally scheduled to travel to New York for two  
15 weeks of business meetings. However, due to the coronavirus pandemic, my New York  
16 travel plans had to be canceled.

17 18. On March 20, 2020, I left Antigua and returned to the United States. I  
18 have been sheltering in safe and isolated locations due to the COVID-19 global  
19 pandemic.

20 I declare under penalty of perjury under the laws of the United States of  
21 America that the foregoing is true and correct to the best of my knowledge and belief.

22  
23 DATED this 20<sup>th</sup> day of April, 2020.

24  
25   
Jimmy Nguyen

1                    /s/ Scott B. Henrie  
2                    Scott B. Henrie, WSBA #12673  
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9                    /s/ Spencer H. Silverglate  
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12                    Trevor Gillum, FL Bar No. 1003867  
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20                    ***Attorneys for James “Jimmy” Nguyen,***  
21                    ***Subpoenaed Individual***

**CERTIFICATE OF FILING AND SERVICE**

I hereby certify that on April 20, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to those registered with CM/ECF.

Further, I hereby certify that on April 20, 2020, I provided the foregoing to following non-CM/ECF participants via Electronic Mail/Email:

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***Counsel for Defendant:***

Amanda McGovern  
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DATED this 20th day of April, 2020.

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***Attorneys for James "Jimmy" Nguyen,  
Subpoenaed Individual***

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Civil Action No. 18-cv-80176-BLOOM-Hopkins

IRA KLEIMAN, as the personal  
representative of the Estate of David  
Kleiman, and W&K Info Defense  
Research, LLC

*Plaintiffs,*

vs.

CRAIG WRIGHT,

*Defendant.*

**PLAINTIFFS' RULE 26 (A)(1) INITIAL DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(a)(1) and the Court's March 11, 2018 order setting, Plaintiffs Ira Kleiman as personal representative of the estate of David Kleiman, and W&K Info Defense Research, LLC ("W&K") provide the following initial disclosures:

**PRELIMINARY STATEMENT**

These disclosures are based upon information available to Plaintiffs as of the date of this document. By making these disclosures, Plaintiffs do not represent they are identifying each and every document, individual, or other evidence they may use in support of their claims. Rather, Plaintiffs have made a good faith effort to gather and provide information subject to disclosure under Rule 26(a)(1) and Plaintiff reserves the right to supplement or modify these disclosures as additional information is discovered.

These disclosures are also not intended to waive any right to object to the production of any document or tangible thing disclosed on the basis of any privilege, work-product doctrine, relevancy, undue burden, or any other valid objection. No incidental or implied admissions are intended by the disclosures herein.



**A. Individuals Plaintiffs may use to support their claims (Fed. R. Civ. P. 26(a)(1)(A)(i))**

Plaintiffs' investigation is ongoing and Plaintiff reserves the right to supplement the list of individuals disclosed below. Plaintiff provides the name and, if known, the address and telephone number of each individual likely to have discoverable information that Plaintiff may use to support his claims or defenses, unless solely for impeachment, identifying the subjects of the information, as follows:

1. **Ira Kleiman, Plaintiff.** Ira Kleiman possesses information related to Craig Wright ("Craig") and David Kleiman's ("Dave") collaboration on creating Bitcoin, mining bitcoins, and developing valuable intellectual property, as well as Craig's subsequent theft of these assets. Mr. Kleiman may be contacted through undersigned counsel.
2. **Craig Wright, Defendant.** Craig possesses information related to the relationship between himself, Dave, and W&K, including the extent and nature of Dave and Craig's partnership and collaboration in creating Bitcoin, mining bitcoins, and developing various valuable intellectual properties/trade secrets, and the agreements understandings, and ownership structure that arose from those collaborations and partnerships; the actions taken by Craig before and after the time Dave died to take control over bitcoins, intellectual property, and trade secrets belonging to Dave's estate and/or W&K; how Craig has subsequently used and/or saved these assets; and various trusts identified by Craig where Dave's bitcoins may be held; and the actual and constructive fraud perpetuated by Craig against Plaintiffs. Craig may be contacted care of his counsel.
3. **Patrick Paige.** Mr. Page possesses information related to Craig and Dave's collaboration in creating Bitcoin, mining bitcoins, and Craig's use of intellectual property developed by Dave. Mr. Paige's office is located at 933 S. Military Trl., Suite E8, West Palm Beach,

Florida 33415. His phone number is 561.404.3074.

4. **Uyen Nguyen.** Ms. Nguyen possesses information related to the relationship between Craig, Dave, and W&K, including the extent and nature of their partnership and collaboration in creating Bitcoin, mining bitcoins, and developing various valuable intellectual properties/trade secrets, and the agreements understandings, and ownership structure that arose from those collaborations and partnerships; the actions taken by Craig before and after Dave died to take control over bitcoins, intellectual property, and trade secrets belonging to Dave's estate and/or W&K; how Craig has subsequently used and/or saved these assets; and various trusts identified by Craig where Dave's bitcoins may be held. The undersigned is not currently aware of Ms. Nguyen's whereabouts, but Defendant indicated she's located in California. (DE 12-2 at 4).
5. **Andrew O'Hagan.** Mr. O'Hagan possesses information related to the relationship between Craig, Dave, and W&K, including the extent and nature of their partnership and collaboration in creating Bitcoin, mining bitcoins, and developing various valuable intellectual properties/trade secrets. The undersigned is not currently aware of Mr. O'Hagan's contact information.
6. **Ramona Watts.** Ms. Watts is Defendant's wife and possesses information related to the relationship between Craig, Dave, & W&K, including the extent and nature of their partnership and collaboration in creating Bitcoin, mining bitcoins, and developing various valuable intellectual properties/trade secrets, and the agreements understandings, and ownership structure that arose from those collaborations and partnerships; the actions taken by Craig before and after the time Dave died to take control over bitcoins, intellectual property, and trade secrets belonging to Dave's estate and/or W&K; how Craig has

subsequently used and/or saved these assets; and various trusts identified by Craig where Dave's bitcoins may be held; and the actual and constructive fraud perpetrated by Craig against Plaintiffs. Ms. Watts can be contacted at 21 Harebell Hill, Cobham, Surrey, KT11 2RS, England.

7. **Bob Radvanovsky.** Mr. Radvanovsky possess information related to the formation and purpose of W&K. Counsel believes Mr. Radvanovsky's phone number is 630-673-7740.

**B. Documents in Plaintiff's Custody, Possession or Control that May Be Used to Support His Claims (Fed. R. Civ. P. 26(a)(1)(A)(ii))**

Plaintiffs' investigation is ongoing and Plaintiffs reserves the right to supplement the list of categories disclosed below. Plaintiffs provides the following description by category and location (Plaintiffs' counsel's office) of all documents, data compilations, and tangible things in their possession, custody, or control that they may use to support their claims or defenses, unless solely for impeachment as follows:

1. Documentation Plaintiffs attached to the complaint and amended complaint filed in this action;
2. Documentation received from the court of New South Wales relating to Craig and Plaintiffs' bitcoins, relationship, intellectual property, trade secrets, and Craig's claims and actions related to them;
3. Documentation received from the Australian Tax Office relating to Craig and Plaintiffs' bitcoins, relationship, intellectual property, trade secrets, and Craig's claims and actions related to them;
4. Documentation received from Craig.

**C. Damages (Fed. R. Civ. P. 26(a)(1)(A)(iii))**

Plaintiffs' investigation is ongoing and Plaintiffs reserve the right to supplement the information provided concerning damages. As set forth in the Amended Complaint, Plaintiffs have suffered significant damages in the form of Craig having stolen their bitcoins and intellectual property rights. During the time these assets were, and are, held by Craig, they have been worth

between ~\$201,728,340.04 and more than \$27,332,125,781.68, before punitive or treble damages and exclusive of attorney's fees and costs. Plaintiffs have also been damaged as a result of Craig's actual and constructive fraud, but have not yet calculated the precise amount of those damages. Plaintiffs have not yet identified an expert or experts to be called to testify as to damages at trial and to assist in the calculation of the amount of damages Plaintiff will seek at trial. As discovery in this matter has not yet commenced, Plaintiffs will supplement this initial disclosure statement with any additional information uncovered regarding damages.

**D. Insurance Agreements (Fed. R. Civ. P. 26(a)(1)(A)(iv))**

Plaintiffs are not aware of any insurance agreement under which any insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**E. Reservation of Rights**

Discovery is ongoing. Plaintiffs reserve: (a) their right to supplement any information in this disclosure; (b) all objections to the admissibility of documents and/or witnesses disclosed by any party; and (c) their right to use as evidence any documents and/or witness testimony disclosed by any party or filed in this action.

Dated: May 25, 2018.

Respectfully submitted,

s/ Velvel (Devin) Freedman

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*Counsel to Plaintiff Ira Kleiman as Personal  
Representative of the Estate of David Kleiman  
and W&K Info Defense Research, LLC.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 25, 2018, a true and correct copy of the foregoing was served on all counsel of record identified on the Service List below via e-mail:

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